

**THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**WSOU INVESTMENTS, LLC D/B/A  
BRAZOS LICENSING AND  
DEVELOPMENT,**  
*Plaintiff,*

**v.**

**CANON INC. AND CANON U.S.A.,  
INC.**  
*Defendants.*

**CIVIL ACTION 6:20-cv-00980-ADA  
CIVIL ACTION 6:20-cv-00981-ADA**

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**CANON INC.,**  
*Third-Party Plaintiff,*

**v.**

**NXP USA, INC.,**  
*Third-Party Defendant.*

**CIVIL ACTION 6:20-cv-00980-ADA**

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**OPPOSED MOTION FOR LETTER OF REQUEST FOR FOREIGN DISCOVERY**

Defendants Canon Inc. and Canon U.S.A., Inc. (collectively “Defendants”) seek foreign discovery from third party witnesses residing in Finland. Defendants have attached an Exhibit with a Letter of Request which includes Document Requests and Deposition Topics. Defendants respectfully request that the Court execute the Letter of Request attached as Exhibit A. Defendants further request that, after the Court has signed the Letter of Request, the Clerk of this Court authenticate the Court’s signature under the seal of this Court, and return the original signed and sealed executed Letter, and two certified copies of the signed and sealed executed Letters, to Defendants’ counsel, John Jackson, for delivery to the proper authority.

Dated: March 25, 2022

By: /s/ Richard F. Martinelli

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*Attorneys for Defendants Canon Inc. and Canon  
U.S.A., Inc.*

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for Canon Inc. and Canon U.S.A., Inc. contacted counsel for Plaintiff regarding the foregoing Motion. Plaintiff did not provide an affirmative response to Canon Inc. and Canon U.S.A., Inc.'s request to resolve this matter (via email and subsequent phone call). Canon Inc. and Canon U.S.A., Inc. presume that Plaintiff opposes this motion.

/s/ John M. Jackson  
John M. Jackson

**CERTIFICATE OF SERVICE**

The undersigned certifies that on March 25, 2022, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(b)(1).

/s/ John M. Jackson  
John M. Jackson